



National Science Foundation

OpenNSF
Privacy Impact Assessment
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Table of Contents

1.	CONTACT INFORMATION.....	1
2.	GENERAL SYSTEM INFORMATION	1
3.	DATA IN THE SYSTEM.....	2
4.	ATTRIBUTES OF THE DATA (USE AND ACCURACY)	2
5.	SHARING PRACTICES.....	3
6.	NOTICE TO INDIVIDUALS TO DECLINE/CONSENT USE.....	3
7.	ACCESS TO DATA (ADMINISTRATIVE AND TECHNICAL CONTROLS).....	4
8.	PRIVACY ANALYSIS.....	5

Revisions

Revision Number	Author	Date	Description
Initial PIA	P Gartner	March 2010	Original PIA

Privacy Impact Assessment Form

1. CONTACT INFORMATION

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Office of Information and Resource Management
703-292-7535

2. GENERAL SYSTEM INFORMATION

1. Name of System or Electronic Collection of Information:

OpenNSF (<http://opennsf.ideascale.com/>)

2. Description of System or Electronic Collection of Information:

OpenNSF is a Software as a Service (SaaS) public engagement tool hosted outside the NSF infrastructure. It allows NSF to conduct online dialogues with the public and employees to collect ideas on specific topics.

3. What is the purpose of the System or Electronic Collection of Information?

OpenNSF enables the public to submit ideas to NSF, and comment and vote on ideas submitted by others.

4. Requested Operational Date?

OpenNSF became operational on February 6, 2010. At that time it was supported by GSA and operated under a PIA completed by them:

http://www.gsa.gov/Portal/gsa/ep/contentView.do?contentType=GSA_BASIC&contentId=29062.

NSF assumed control of the system in June 2010.

5. Does this collection create a new Privacy Act System or is this information collection covered by an existing Privacy Act System? If so, what is the name of the current Privacy Act System?

No.

6. What specific legal authorities, arrangements, and/or agreements require the collection of this information?

The use of a public engagement tool by all CFO agencies was required by the Open Government Directive, M10-06:

<http://www.whitehouse.gov/open/documents/open-government-directive>.

7. Is this an Exhibit 300 system/project?

No.

3. DATA IN THE SYSTEM

1. What data is to be collected?

The Foundation does not collect, maintain, or disseminate PII from individuals who interact with the agency's accounts on third-party social websites. Although some social websites, such as YouTube, Facebook, MySpace, and Twitter, may request information, such as a name, email address, and birth date, at the time of registration, the agency does not collect, maintain, or disseminate PII from individuals who interact with the agency's account. The agency will use third-party social websites to disseminate mission-related information that has been collected and approved for public dissemination. NSF does not own, manage, or control the applications used on third-party social websites.

2. What are the sources of the data?

Voluntary submissions by participants visiting the site.

3. Why is the data being collected?

To collect suggestions from the public on topics of importance to NSF.

4. What technologies will be used to collect the data?

A website developed and hosted as Software as a Service by IdeaScale will be used to collect the data.

5. Does a personal identifier retrieve the data?

No.

4. ATTRIBUTES OF THE DATA (USE AND ACCURACY)

1. Describe the uses of the data:

Ideas, comments and ranking of ideas will be used by NSF in considering the topic of the dialogue.

Zip codes may be used by the service provider to aggregate responses for purposes of metrics (such as number of responses from various regions of the country).

2. Does the system analyze data to assist users in identifying previously unknown areas of note, concern or pattern?

No.

3. How will the data collected from individuals or derived by the system be checked for accuracy?

NSF does not collect, maintain, or disseminate PII from individuals who interact through social media web sites.

5. SHARING PRACTICES

1. Will the data be shared with any internal or external organizations?

Information may be shared within NSF to those who demonstrate a need-to-know the information in the performance of their official duties. This may involve public user-posted comments (feedback) being shared with appropriate personnel in order to improve the way NSF uses social networking websites to be transparent and accountable to the public.

2. How is the data transmitted or disclosed to the internal or external organization?

All content will be posted on NSF's social networking account pages and websites. Information may also be shared by other electronic means and in paper form. The Foundation's policies and procedures for information sharing are in effect.

3. How is the shared data secured by external recipients?

NA

6. NOTICE TO INDIVIDUALS TO DECLINE/CONSENT USE

1. Was notice provided to the different individuals prior to collection of data?

A privacy policy is posted on the site at <http://www.nsf.gov/open/privacy.jsp>

2. Do individuals have the opportunity and/or right to decline to provide data?

In order to use the site, visitors must provide a valid email address. Individuals who prefer not to create an account can email their ideas and comments to NSF for posting. IdeaScale uses persistent cookies to save user login information (the user's login ID) between sessions. The user is given a choice (the "opt in" approach) to check a "Remember Me" box. This is an optional convenience to the user who then does not have to remember their login information each time they

visit the site. IdeaScale also uses a persistent cookie to support the use of external login IDs (e.g., Google, AOL, Yahoo, Wordpress, etc.). This allows the public to interact with IdeaScale without having to create a new login ID for use with the site if the user has already voluntarily chosen to have an ID with these other partners. This functionality will not work without a persistent cookie. The user can create a new login ID for the IdeaScale site to avoid accepting this cookie. No personal information is saved in either of these two cookies set by IdeaScale, nor can these cookies be used to track user activities across other websites. A cookie waiver for OpenNSF has been issued by the NSF Director.

3. Do individuals have the right to consent to particular uses of the data?

N/A

7. ACCESS TO DATA (ADMINISTRATIVE AND TECHNICAL CONTROLS)

1. Is the data secured in accordance with FISMA requirements?
If **Yes**, provide the date that the Certification and Accreditation was completed.
If **No**, answer questions 2-5 below.

No.

2. Which user group(s) will have access to the system?

NSF does not own or control access to the third-party social websites. If an individual desires to seek information about a social website's technical access and security, the individual should review Ideascales posted privacy notice.

3. How is the access to the data by a user determined? Are procedures documented?
 - System administrators and developers of code have access to data as appropriate to fulfill their roles.
 - Vendor associates' access to the system is controlled by the vendor and is dictated by duties and requirements of their positions and by the terms of the service agreement.
 - Moderators, who are NSF employees, have access to the dialogues and can delete inappropriate comments and/or promote off topic comments to another site. They also have access to the email addresses of the authors of ideas and comments so they can contact them as appropriate.
4. How are the actual assignments of roles and rules verified according to the established security and auditing procedures?

The IDB branch chief, WEBOPs section head and IDB system administrator are the only individuals with system administration/ code developer permissions.

- Vendor associate roles are controlled by the vendor.
- Moderator permissions are assigned on an individual basis by one of the individuals with system administration privileges in IDB upon approval by the business owner of the dialogue.

5. What auditing measures/controls and technical safeguards are in place to prevent misuse (e.g., unauthorized browsing) of data?

System Administrators and Moderators are operating under the same rules of behavior for NSF and Federal employees in terms of protecting the privacy of others and not using information in the system for personal gain or to the benefit of others. Passwords, user ids and segmentation of function provide adequate protections.

6. Describe the privacy training provided to users, either generally or specifically relevant to the program or system?

All NSF personnel must complete NSF's annual security and privacy awareness training.

7. Will NSF contractors have access to the system? If so, will they be trained on privacy principles?

No

Has the retention schedule been established by records management?

Retention schedule pending NARA review and approval.

If so, what is the retention period for the data in the system?

Pending NARA review and approval.

8. What are the procedures for identification and disposition of the data at the end of the retention period?

See my note at 7.

8. PRIVACY ANALYSIS

Given the amount and type of data being collected, discuss what privacy risks were identified and how they were mitigated.

There are no known effects on the due process rights of individuals who avail themselves of the tool. This system is not linked to other files and systems.

Participants are presented with a clear disclaimer in the Privacy Policy that any submissions of email addresses, first and last name, or zip code are voluntary and that this is not a privacy act system of record.